
**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

TYRESE DREW,

Plaintiff,

v.

CORECIVIC, Inc., et al.,

Defendants.

Case No. CIV-23-286-RAW-JAR

PLAINTIFF’S PRELIMINARY EXHIBIT LIST

Plaintiff hereby submits the following list of exhibits which may be offered at trial in anticipation of being marked as exhibits and entered into evidence. Plaintiff further incorporates all exhibits included in Defendant’s Exhibit List.

This submission is subject to the Court’s determinations on any party motions and objections, including Plaintiff’s Motions in Limine and Motions to Exclude. This submission is further subject to the redaction of the potential exhibits, including redaction or removal of inadmissible and unoffered matters. This submission is not a concession of admissibility as to any item listed, nor a present offer of any exhibit. Plaintiff reserves the right to add additional exhibits or take exhibits off this list, as may be necessary, based on further court rulings. In addition, Plaintiff reserves the right to supplement this list with any

documents produced or discovered up to the time of trial. Plaintiff reserves the right to offer all documents produced by Defendant in discovery.

Please take note that the exhibits will not be tendered in the order that they are numbered.

PL EX#	DESCRIPTION	BATES #	Expected to be Used	Used if Need Arises
1	Packet 5-1	DREW-CIV-23-286; 1-58	X	
2	Drew-Classification. Transfer packet	DREW-CIV-23-286; 59-101	X	
3	Drew-Commissary Account History	DREW-CIV-23-286; 102-104		X
4	Drew-Housing History	DREW-CIV-23-286; 105		X
5	Drew, Tyrese RTS 2021	DREW-CIV-23-286; 106-119		X
6	Emails regarding Tyrese Drew	DREW-CIV-23-286; 120-178	X	
7	Movement from Recell (video)	DREW-CIV-23-286; 179	X	
8	Movement main medical ambulance (video)	DREW-CIV-23-286; 180	X	
9	Call records summary report	DREW-CIV-23-286; 181-216		X
10	Investigation Report. From Oklahoma Department of Corrections	DREW-CIV-23-286; 218-231	X	
11	Lindsay Municipal Hospital Records	TD000001-TD001048	X	
12	OU Medical Center Records	TD001049-TD001988	X	
13	Air Evac Records	TD001973-TD001988	X	
14	Hughes County EMS Records	TD001991-TD002012	X	
15	Photograph of Plaintiff before the subject incident	TD002013	X	
16	Photographs of Plaintiff in hospital after incident	TD002014-TD002015	X	
17	Daily Shift Rosters			X
18	Facility Schematic, Davis Correctional Facility			X

19	CoreCivic Policies and Procedures			X
20	Exhibits listed by Defendant not objected to by Plaintiff			
21	Exhibits identified and exchanged via continuing discovery			X
22	Exhibits necessary for impeachment or rebuttal			X

Respectfully submitted,

/s/Jim Buxton

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-and-

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CERTIFICATE OF EFC FILING/SERVICE

I certify that on the 12th day of January 2024, I caused to be filed electronically the foregoing document to the Clerk of the Court using the ECF system.

Darrell L. Moore

/s/ Jim Buxton

JIM BUXTON